

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE EASTERN DISTRICT OF VIRGINIA
(Alexandria Division)**

In re: GUNNING MOTORS, INC. Debtor	Case No. 10-11896-RGM Chapter 11
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**NOTICE OF HEARING ON MOTION PURSUANT TO 11 U.S.C. SECTION
506(c) TO SURCHARGE COLLATERAL FOR PAYMENT OF
ADMINISTRATIVE EXPENSES**

Culbert & Schmitt, PLLC, counsel for the Debtors, has filed papers with this Court, specifically a Motion Pursuant to 11 U.S.C. Section 506(c) to Surcharge Collateral for Payment of Administrative Expenses (the "Motion"). Counsel seeks payment of fees in the amount of \$42,665 and expenses in the amount of \$1,353.00. A copy of the Motion is available from the undersigned counsel or from the Bankruptcy Court web site at www.vaeb.uscourts.gov.

Your rights may be affected. You should read these papers carefully and discuss them with your attorney, if you have one in this bankruptcy case. (If you do not have an attorney, you may wish to consult one.)

A hearing will be held on the attached Motion on **July 27, 2010 at 11:00 a.m.** at the United States Bankruptcy Court, 200 South Washington Street, Alexandria, Virginia 22314, Third Floor Courtroom. If you do not wish the Court to grant the relief sought in the Motion, or if you want the Court to consider your views on the Motion, then on or before July 23, 2010, your or your attorney must file with the Court, at the address shown above, a written response with supporting memorandum as required by Local Bankruptcy Rule 9013-1(H). **Unless a written response and supporting memorandum are filed and served by the date specified, the Court may deem any opposition waived, treat the Motion as conceded, and issue order granting the requested relief without further notice or hearing.** If you mail your response to the Court for filing, you must mail it early enough so the Court will **receive** it on or before the date stated above.

Ann E. Schmitt, VSB # 22030
Culbert & Schmitt, PLLC
30C Catocin Circle, SE
Leesburg, VA 20175
703-737-6377 (telephone)
703-737-6370 (facsimile)
aschmitt@culbert-schmitt.com

You must **also** mail a copy to the person listed below.

Ann E. Schmitt
Culbert & Schmitt, PLLC
30C Catoctin Circle, SE
Leesburg, Virginia 20175

Office of the United States Trustee
115 South Union Street
Alexandria, VA 22314

If you or your attorney do not take these steps, the Court may decide that you do not oppose the relief sought in the Motion and may enter an order granting that relief.

Date: July 2 2010

/s/ Ann E. Schmitt
Ann E. Schmitt (VSB # 22030)
Culbert & Schmitt, PLLC
30C Catoctin Circle, SE
Leesburg, VA 20175
Counsel for Debtor
(703) 737-6377
Aschmitt@culbert-schmitt.com

CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the foregoing notice and the Motion were served on all parties on the attached mailing matrix, on the 2nd day of July, 2010 by U.S. Mail, first class, postage prepaid and on the following

Terry C. Frank
Paul Campsen
Kaufman & Canoles, P.C.
Three James Center, 12th Floor
1051 E. Cary Street
Richmond, VA 23219

/s/ Ann E. Schmitt